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VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Re: *Structures and Practices of the Video Relay Service Program*, CG Docket No. 10-51; *Telecommunications Relay Services, and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123

Dear Ms. Dortch,

By this letter, ZVRS Holding Company, parent company of CSDVRS, LLC d/b/a ZVRS and Purple Communications, Inc. (together, the “Companies”), expresses its support for the motion filed by Sorenson Communications, Inc. (“Sorenson”)¹ requesting extensions of (1) the deadlines for providers of Video Relay Services (“VRS”) to announce their intent to participate in the trials of skills-based routing and deaf interpreters (the “Trials”); and (2) the start date of the 8-month Trial periods. The Companies agree that grant of the requested extensions would “benefit the Commission and the public interest by encouraging broader participation in the Trials and maximizing the data that results from them, without any corresponding harm or undue delay.”²

¹ Sorenson Communications, Inc. Motion for Extension of Time, CG Docket Nos. 10-51 & 03-123 (filed May 18, 2017).

² *Id.* at 2.



Although the Companies support the Trials approved by the Commission in its March 23, 2017 Order,³ they are not yet able to determine their participation until the Commission adopts VRS compensation rates for the 2017-2018 funding year. The Companies will need to know the compensation rates in order to evaluate whether they have the resources and financial means to participate in the Trials. Participation in the Trials will require the Companies to make technical modifications to the platform and to staff specialized video interpreters and deaf interpreters. The Companies would also need additional time to prepare for the Trials in the event that they decide to participate.

For these reasons, the Companies are unable to commit to participating in the Trials by the June 1, 2017 deadline. Nevertheless, the Companies hereby provide notice of their preliminary intent to participate in the Trials pending the Commission's adoption of VRS compensation rates for the 2017-2018 funding year, at which time the Companies will determine whether to participate in the Trials. Additionally, as explained above, it would take the Companies substantial time and effort to prepare for the Trials should they decide to participate. The Companies therefore respectfully request that the Trials commence 180 days following the Commission's adoption of new rates.

The Companies hope to be able to participate in the Trials, for which Deaf and Hard of Hearing consumers have long advocated. The Companies are committed to work with consumer groups and other participating VRS providers to develop standards of metrics for assessment of the costs and benefits of the Trials per the objectives outlined in the Commission's Order.

³ *Structure and Practices of the Video Relay Service Program, et al.*, Report and Order, Notice of Inquiry, Further Notice of Proposed Rulemaking, and Order, 32 FCC Rcd. 2436 (2017) ("Order").



Respectfully submitted,

/s/
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